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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
CHARLES BARRETT,  
  
Defendants.

CASE NO. 1:22-CR-00213-ADA-BAM  
UNITED STATES' SUPPLEMENTAL EXHIBITS  
DATE: June 20, 2023  
TIME: 8:30 a.m.  
COURT: Hon. Ana de Alba

The United States' offers two supplemental exhibits for the Court's consideration in support of previously filed briefing. Dkt 50, 52. These two supplemental exhibits were not reviewed until after the United States filed its Motion *in Limine* Regarding the Defendant's Crimes, Wrongs and Other Acts (Dkt 50) and Motion *in Limine* Under Federal Rule of Evidence 412 (Dkt 52). These two exhibits are relevant for the Court's consideration in resolving the issues previously briefed.

**Additional Exhibit Related to Government's Notice of Barrett's Other Acts (Dkt 50)**

On October 17, 2022 at 1057 hours Barrett placed a phone call to a friend, J.H. On the call J.H. and Barrett discussed what action he should take against the alleged victims because they reported him. J.H. stated "it's definitely worth like after this all goes down, I don't know, something." In response he stated, "oh something will happen that's for sure...in the courts or not." J.H. responded "yeah, well don't say stuff like that, that's gonna get you in trouble immediately and more so and make everyone believe that you are capable of the things you are accused of. So you basically can't think like that."

Barrett responded “well if I don’t get out of here I got people in here that I made contact with because they fucking put me in here with murderers.” This conversation is admissible for the reasons articulated in the United States’ Notice and Motion *in Limine* Regarding the Defendant’s Crimes, Wrongs and Other Acts. Dkt. 50 at 8-10.

**Additional Exhibit Related to Government’s Federal Rule of Evidence 412 Motion (Dkt 52)**

On February 15, 2023 Barrett called his friend R.N at 1956 hours. On the call, they discuss that Barrett’s attorneys are planning to review K.G.’s phone. During this discussion, Barrett stated “yeah, we just need her to like... well I don’t know what is on there because it was 7 years ago. We need her to have ‘hey I am on my way up to see you’ because she is denying that and ‘I am coming to bang.’” This conversation is admissible for the reasons stated in the United States’ Motion *in Limine* under Federal Rule of Evidence 412. Dkt 52 at pgs. 10-11 regarding Barrett’s inability to meet his required burden to admit purported sexual messages between himself and K.G.

The United States requests this Court consider these two supplemental exhibits in assessing the issues previously briefed and before the Court.

Dated: June 6, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ Arin C. Heinz  
ARIN C. HEINZ  
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# Exhibit 1

Placeholder for October 17,  
2022 Jail Call

## Exhibit 2

Placeholder for February 15,  
2023 Jail Call